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5 Attorney for Defendant
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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 OAKLAND BRANCH

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18 UNITED STATES OF AMERICA,) No. CR 11-00905 SBA
19 Plaintiff,)
20 v.) STIPULATION AND [PROPOSED]
21 JORDAN MOORE,) ORDER TO CONTINUE STATUS
22 Defendant.) HEARING TO FEBRUARY 18, 2015
23 _____)

24 The above-captioned matter is set for December 15, 2014 before this Court for a status hearing.

25 The parties jointly request that the Court vacate the December 15, 2015 appearance and set this matter for
26 status conference on February 18, 2015 at 9:30 a.m and that the Court exclude time under the Speedy Trial
Act between the date of this stipulation and February 18, 2015. The parties stipulate that the time is
excludable from the time limitations of the Speedy Trial Act because the interests of justice are served by
granting a continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

27 The continuance is a joint request by the parties to finalize a plea agreement that will resolve
pending robberies that require coordination with and releases from other jurisdictions. Further, the parties
are in need of additional time to prepare defendant's waiver of rights under the Federal Juvenile
U.S. v. MOORE 11-cr-00905-SBA
Stipulation & [Proposed] Order to Continue Status Conference

1 Delinquency Act and proposed Findings of Fact¹ so that defendant may proceed with the proposed adult
2 disposition before this court. This continuance will allow for reasonable time necessary for effective
3 preparation and continuity of counsel, taking into account the complexity of the case and the exercise of
4 due diligence.

5 As such, the parties respectfully request that the time between the date of this stipulation and
6 February 18, 2015 be excluded under U.S.C. § 3161(h)(7)(A) and (B)(iv).

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8 DATED: December 11, 2014

Respectfully submitted,

9 MELINDA HAAG
10 United States Attorney

11 /s/ Christina McCall
12 CHRISTINA McCALL
13 Assistant United States Attorney

14 /s/ Garrick S. Lew
15 GARRICK S. LEW
16 Attorney for Jordan Moore

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26 Four of the charged robberies occurred out of district when defendant was 17 years old, as a minor, and will be included in the
27 proposed Information to resolve all outstanding unresolved robberies. Defendant is now 21 years old, in custody, and is serving
an 8 year state prison sentence.

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3 **[PROPOSED] ORDER**

4 Based on the reason provided in the stipulation of the parties above, the Court hereby FINDS that
5 for adequate preparation of the case by all parties, and in the interest of justice, pursuant to 18 U.S.C.
6 sections 3161(h)(7)(A) and (B)(iv), an exclusion of time is warranted under the Speedy Trial Act. Based
7 on these findings, IT IS HEREBY ORDERED THAT the hearing is continued until February 18, 2015 at
8 9:30 a.m., and time is excluded until February 18, 2015.

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10 **IT IS SO ORDERED.**

11 DATED: 12/12/14

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13 KANDIS A. WESTMORE
14 United States Magistrate Judge